

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION

RUBIN YOUNG, SYBEL W. LEE,
KEITH WILSON, WILLIE A. THOMAS et al.,

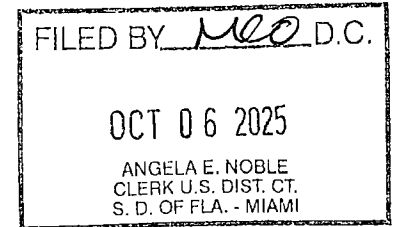
Case No.: 25-cv-23025

Plaintiffs,

v.

HON. DONALD J. TRUMP, PRESIDENT OF THE UNITED STATES;
HON. PAM BONDI, ATTORNEY GENERAL OF THE UNITED STATES;
HON. SCOTT TURNER, SECRETARY OF HOUSING AND URBAN DEVELOPMENT;
HON. RON DESANTIS, GOVERNOR OF THE STATE OF FLORIDA;
HON. JAMES UTHMEIER, ATTORNEY GENERAL OF FLORIDA;
HON. DANIELLA LEVINE CAVA, MAYOR OF MIAMI-DADE COUNTY, et al.,

Defendants,



**PLAINTIFFS' MOTION FOR CLERK'S ENTRY OF DEFAULT AND DEFAULT
JUDGMENT AGAINST DEFENDANTS DONALD J. TRUMP, PAM BONDI, AND
SCOTT TURNER**

COMES NOW, Plaintiffs RUBIN YOUNG, SYBEL W. LEE, KEITH WILSON, and WILLIE A. THOMAS, appearing *pro se*, pursuant to Federal Rules of Civil Procedure 4, 11, 55, and 60, and hereby respectfully move this Honorable Court, through its Clerk, for entry of default and default judgment against Defendants President Donald J. Trump, United States Attorney General Pam Bondi, and HUD Secretary Scott Turner, for failure to plead or otherwise defend as required by law.

I. LEGAL STANDARD

Federal Rule of Civil Procedure 55(a) provides that:

“When a party against whom a judgment for affirmative relief is sought has failed to plead or otherwise defend, and that failure is shown by affidavit or otherwise, the clerk must enter the party’s default.”

Entry of default is a **ministerial duty** of the Clerk when a defendant, after proper service, fails to answer or otherwise defend within the prescribed period. See *United States v. One 1987 Jeep Wrangler*, 972 F.2d 472, 480 (2d Cir. 1992). Default admits all well-pleaded allegations of the Complaint. *Nishimatsu Constr. Co. v. Houston Nat'l Bank*, 515 F.2d 1200, 1206 (5th Cir. 1975). The Eleventh Circuit has long held that default is appropriate under these circumstances. *Arango v. Guzman Travel Advisors Corp.*, 761 F.2d 1527, 1530 (11th Cir. 1985).

Where multiple defendants are involved, courts follow *Frow v. De La Vega*, 82 U.S. 552 (1872), requiring coordinated treatment of defaults to avoid inconsistent judgments.

II. SERVICE OF PROCESS

Plaintiffs properly served each federal defendant in accordance with Rule 4(i) of the Federal Rules of Civil Procedure. Proof of service is attached as Exhibits A–D.

1. Donald J. Trump, President of the United States

Served via USPS Certified and Priority Mail, Green Card Return Receipt, mailed July 21, 2025, to The White House, 1600 Pennsylvania Avenue NW, Washington, DC 20500. Delivery confirmed July 25, 2025, at 5:00 AM (Exhibit B).

2. Scott Turner, U.S. Secretary of Housing and Urban Development

Served via USPS Certified and Priority Mail, Green Card Return Receipt, mailed July 21, 2025, to HUD, 451 7th Street SW, Washington, DC 20410. Delivery confirmed July 25, 2025, at 6:58 AM (Exhibit C).

3. Pam Bondi, U.S. Attorney General

Served via USPS Certified and Priority Mail, Green Card Return Receipt, mailed July 21, 2025, to U.S. Department of Justice, 950 Pennsylvania Avenue NW, Washington, DC 20044. Delivery confirmed July 25, 2025, at 5:01 AM (Exhibit D).

Additionally, service on behalf of these officials was made through Assistant U.S. Attorney Hayden P. O'Byrne, Civil Process Clerk, Southern District of Florida, pursuant to Rule 4(i)(1)(A), completed July 23, 2025 (Exhibit A).

Each defendant had **60 days** to respond. As of this filing, no answer, appearance, or responsive pleading has been filed. Thus, default is mandatory.

III. ARGUMENT

- The Defendants were properly served under Rule 4(i).
- More than sixty (60) days have elapsed without any appearance or response.
- Under Rule 55(a), the Clerk's duty is *ministerial* — default must be entered once proof of non-response is shown. See *One 1987 Jeep Wrangler*, 972 F.2d at 480.
- Default judgment is then appropriate under Rule 55(b), as Defendants' failure constitutes an admission of all well-pleaded facts. See *Nishimatsu*, 515 F.2d at 1206.
- Federal officials and agencies do not enjoy immunity from entry of default once lawfully served. Their failure to respond cannot deprive plaintiffs of due process. See *Mason v. Lister*, 562 F.2d 343, 345 (5th Cir. 1977) (default entered against federal officer for failure to answer).

Defendants cannot ignore properly served summons and complaints. Failure to respond undermines the integrity of the judicial process, deprives plaintiffs of their constitutional right to redress, and compels the Clerk to enter default.

IV. REQUEST FOR RELIEF

WHEREFORE, the Plaintiffs—on behalf of the Indigenous of America peoples and the descendants of formerly enslaved African Americans—respectfully pray that this Honorable Court issue a judgment that does not merely resolve a complaint, but restores historical truth,

legal clarity, and national integrity. The Plaintiffs request that the Court GRANT the following relief, separate in application but equal in moral weight, and designed to remedy centuries of state-sanctioned erasure, economic subjugation, and constitutional betrayal:

1. CLASS CERTIFICATION

Pursuant to Federal Rule of Civil Procedure 23, certify this action as a class action on behalf of:

- Class A: All Indigenous of America peoples and their nations who have suffered dispossession, cultural genocide, denial of sovereignty, and forced displacement.
- Class B: All descendants of emancipated African slaves born or residing in the United States who continue to endure the unredressed consequences of chattel slavery, Jim Crow apartheid, and 14th Amendment misinterpretation.

2. DECLARATORY RELIEF: RESTORING SOVEREIGNTY AND CITIZENSHIP CLARITY

- Declare that Indigenous of America peoples are sovereign nations with inherent rights to land, governance, and self-determination, rooted in natural law and treaty obligations—independent of the 13th, 14th, or 15th Amendments.
- Declare that the 14th Amendment's Citizenship Clause was intended exclusively to protect formerly enslaved African Americans and their descendants and was never designed to confer automatic citizenship on the children of undocumented immigrants, foreign nationals, or sovereign tribal members outside the jurisdiction of U.S. law.

3. INJUNCTIVE RELIEF: HALTING CONTINUED ABUSES

- Bar federal, state, and local authorities from unlawfully expanding the Citizenship Clause.

- Halt land seizures, displacement, cultural exploitation, and gentrification projects targeting Indigenous and African-descended communities.
- Prohibit misallocation of CDBG, HUD, and Economic Opportunity Act funds to ineligible entities.
- Mandate community-led governance over federal programs affecting these protected classes.

4. RESTORATION AND REPARATIONS: TANGIBLE REDEMPTION

- Restore land titles and tribal sovereignty where rightful claims exist.
- Order a one-time federal reparations award of \$30 trillion, plus annual reparations of \$500 billion retroactive to 1868.
- Establish Guaranteed Income Programs, Sovereign Economic Development Zones, Black-owned and Indigenous-owned Banking Initiatives, Educational Trusts, Housing Reparations, and Business Capital Access Programs.

5. RECOGNITION OF HISTORICAL LEADERSHIP AND CULTURAL PRESERVATION

- Reinstate the name, work, and legacy of Mrs. Mary L. Hill and other erased leaders of anti-poverty and civil rights programs.
- Establish a permanent national museum and archive dedicated to Indigenous and African-descended history, contributions, and sacrifices.

6. TRUTH AND RECONCILIATION COMMISSION WITH ENFORCEMENT POWER

- Create a federally funded, independent commission to investigate historical atrocities, hold hearings, collect testimony, and oversee reparative measures.

7. ACCOUNTABILITY IN GOVERNANCE AND FUND ADMINISTRATION

- Bar non-citizens or ineligible individuals from administering funds for these communities.
- Require documented cultural and ancestral ties for individuals or organizations directing such funding.

8. AUDITS, COMPLIANCE, AND TRANSPARENCY.

- Order GAO forensic audits of all CDBG, HUD, and Economic Opportunity Act disbursements from 1970 to present.
- Publicly report findings and mandate prosecution for fraud, abuse, or racial diversion.

9. LEGAL COSTS AND EQUITABLE RELIEF

- Award all costs of litigation, including attorney fees, expert witness expenses, filing costs, and service fees.
- Create ongoing monitoring mechanisms to ensure compliance with judicial orders.
- Grant any additional relief necessary to effectuate justice consistent with constitutional principles and historical truth.

Respectfully Submitted on October 3, 2025.

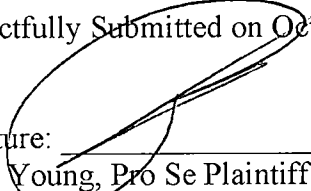
Signature: _____

Rubin Young, Pro Se Plaintiff
14060 SW 258th Street
Homestead, FL 33032
786-847-9111
commtrus@yahoo.com

CERTIFICATE OF COMPLIANCE

I hereby certify that this document complies with the type-volume limitation set forth in the Local Rules of the Southern District of Florida and Federal Rule of Civil Procedure 23. This complaint contains 1,832 words, excluding the parts exempted by the Rules.

Respectfully Submitted on October 3, 2025.

Signature: 

Rubin Young, Pro Se Plaintiff
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CERTIFICATE OF INTERESTED PARTIES

Pursuant to Local Rule 7.1(a)(2)

The undersigned, pursuant to Local Rule 7.1(a)(2), hereby certifies that the following individuals, entities, and government officials are believed to have a direct financial, administrative, legal, political, or constitutional interest in the outcome of this case. Each named party, whether as defendant or agency representative, is hereby recognized as having a right to full equal protection under the law, access to due process, and an interest in the equitable administration of justice arising from the relief sought:

Plaintiffs:

- Rubin Young
- Sybel W. Lee
- Keith Wilson,
- Wille A. Thomas

Defendants:

- President Donald J. Trump (United States of America)
- HUD (Scott Turner)
- DOJ (Pam Bondi, Jody Hunt)

- State of Florida (Ron DeSantis, James Uthmeier)
- Miami-Dade County (Daniella Levine Cava, Juan Fernandez-Barquin, Pedro J. Garcia)
- Board of County Commissioners and Dept. Heads

Note:

All listed parties are considered integral to the constitutional questions, statutory claims, and equitable remedies raised in this case. Each bears a potential or actual role in policy implementation, resource distribution, regulatory enforcement, and historical redress. All are entitled to equal protection and transparency as required under the U.S. Constitution, federal law, and international human rights norms.

Respectfully Submitted on October 3, 2025.

Signature: _____


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CERTIFICATE OF SERVICE

I **certify** that a copy of this complaint has been served on all parties via [U.S. mail/fax/email] on October 3, 2025.

- President Donald J. Trump (United States of America)
- HUD (Scott Turner)
- DOJ (Pam Bondi, Jody Hunt)
- State of Florida (Ron DeSantis, James Uthmeier)
- Miami-Dade County (Daniella Levine Cava, Juan Fernandez-Barquin, Pedro J. Garcia)
- Board of County Commissioners and Dept. Heads

Respectfully Submitted on October 3, 2025.

Signature: 

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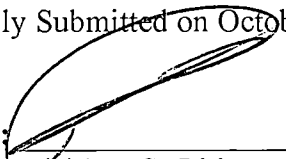
STATEMENT OF INTEGRITY

I, Rubin Young, Pro Se Plaintiff, hereby declare under penalty of perjury under the laws of the United States of America that the foregoing statements, arguments, and factual assertions contained in this Complaint and Memorandum of Law are true and correct to the best of my knowledge, information, and belief. This document is prepared with the utmost respect for the truth, legal standards, and historical accuracy.

No material fact has been knowingly omitted or misstated. This filing represents a sincere and good-faith effort to seek justice for the Indigenous of America peoples and descendants of enslaved Africans, to uphold constitutional principles, and to promote equitable remedies based on documented historical and legal grounds.

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Respectfully Submitted on October 3, 2025.

Signature: 

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